## PAUL R. OBER & ASSOCIATES

A PENNSYLVANIA PARTNERSHIP

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paul@oberandassociates.com January 23, 2007

Independence Regulatory Review Commission Attn: Arthur Coccodrilli, Chairman 333 Market Street, 14th Floor Harrisburg, PA 17101

## RE: Dog Law Act 225

Dear Mr. Coccodrilli:

I am both an attorney who has practiced law in the Commonwealth of Pennsylvania for over 33 years and a breeder of Field Irish Setters, which activity I have been engaged in for in excess of thirty-six (36) years.

During the above time, my kennels (located at my home) have been inspected by the Department of Agriculture (Dog Law Enforcement) and the AKC on a routine basis. Throughout that entire time, I have *never* received a negative inspection report.

My dogs are sold on a world-wide basis. I am proud to have bred, trained and developed numerous national champions. My kennel is endorsed by Orvis.

Nonetheless, my kennel facilities do not and cannot meet the requirements mandated in Act 225, nor is it intelligently realistic to provide such accommodations.

Simply stated, the standards contained in Act 225 serve no legitimate purpose whatsoever concerning the socialization, health, performance or comfort of canines.

As you know, I am required to report the acquisition date, disposition date, type of sale, breed, sex, color, whelping date and identification number on all dogs transferred by me, whether sold, given (and you should know that I make 4-6 charitable donations of my dogs each year), adopted or given away. Those records are supplied on a twice per year basis to the Department of Agriculture and must be available for review by the AKC on a constant basis.

SUBURBAN OFFICES by appointment

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Again, never has my kennel been in violation of any of these requirements.

Bringing my kennel into conformity with requirements of the Act would be, simply stated, impossible unless I completely dismantle existing facilities and begin again from scratch. To ask me to do so is ridiculous.

Moreover, there is no scientific, veterinary or other justification for these proposed changes.

I *urge* you to withdraw this proposal. My suggestion is that a committee be formed, consisting of at least 75% kennel operators (of which I would happily volunteer to be one) to review and rewrite Pennsylvania's regulations.

Your assistance in defeating this bill would be deeply appreciated.

Thank you for your anticipated cooperation.

Very Truly Yours, Paul R. Ober & Associates

Paul R. Ober, Esquire

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